UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

COOLEY LLP

Cullen D. Speckhart (admitted pro hac vice) Ian Shapiro (admitted pro hac vice) Russell Capone (admitted pro hac vice) Michael Klein (admitted pro hac vice)

55 Hudson Yards New York, NY 10001 Tel: (212) 479-6000 Fax: (212) 479-6275

Email: cspeckhart@cooley.com ishapiro@cooley.com rcapone@cooley.com mklein@cooley.com

Proposed Co-Counsel to the Official Committee of Talc Claimants II

BAILEY GLASSER LLP

Brian A. Glasser (admitted pro hac vice) Thomas B. Bennett (admitted pro hac vice) Kevin W. Barrett (admitted pro hac vice) Maggie B. Burrus (admitted pro hac vice) 1055 Thomas Jefferson St. NW, Suite 540

Washington, DC 20007 Tel: (202) 463-2101 Fax: (202) 463-2103

Email: bglasser@baileyglasser.com tbennett@baileyglasser.com kbarrett@baileyglasser.com mburrus@baileyglasser.com

Proposed Co-Counsel to the Official Committee of Talc Claimants II

WALDREP WALL BABCOCK & BAILEY PLLC

Thomas W. Waldrep, Jr. (admitted pro hac vice)

Kevin L. Sink (admitted pro hac vice) James C. Lanik (admitted pro hac vice) Jennifer B. Lyday (admitted pro hac vice)

370 Knollwood Street, Suite 600 Winston-Salem, NC 27103

Tel: (336) 717-1280 Fax: (336) 717-1340

Email: notice@waldrepwall.com

Proposed Co-Counsel to the Official Committee of Talc Claimants II

MASSEY & GAIL LLP

Jonathan S. Massey (admitted pro hac vice) 1000 Maine Ave. SW, Suite 450

Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467

Email: jmassey@masseygail.com

Proposed Co-Counsel to the Official Committee of Talc Claimants II

SHERMAN, SILVERSTEIN, KOHL, ROSE & PODOLSKY, P.A.

Arthur J. Abramowitz
Alan I. Moldoff

Ross J. Switkes

308 Harper Drive, Suite 200 Moorestown, NJ 08057

Tel: (856) 662-0700

Email: aabramowitz@shermansilverstein.com amoldoff@shermansilverstein.com rswitkes@shermansilverstein.com

Proposed Local Counsel to the Official Committee of Talc Claimants II

In re:	Chapter 11
LTL MANAGEMENT LLC,	Case No.: 21-30589 (MBK)
Debtor.	Honorable Michael B. Kaplan

JOINT NOTICE OF APPEAL

PLEASE TAKE NOTICE that the Official Committee of Talc Claimants II ("TCC II"), together with Patricia Cook, Evan Plotkin, Randy Derouen, Kristie Doyle as estate representative of Dan Doyle, Katherine Tollefson, and Tonya Whetsel as estate representative of Brandon Whetsel, hereby appeal to the United States District Court for the District of New Jersey¹ pursuant to 28 U.S.C. §158 and rules 8002 and 8003 of the Federal Rules of Bankruptcy Procedure, from the order (D.I. 1603) (the "Order") denying motions to dismiss, entered on March 2, 2022 by the United States Bankruptcy Court for the District of New Jersey.

PLEASE TAKE FURTHER NOTICE that a copy of the Order is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that the names of all parties to the Order appealed from and the names, addresses and telephone numbers of their respective attorneys are as follows:

<u>Party</u>	Counsel
Official Committee of Talc Claimants II	COOLEY LLP
	Cullen D. Speckhart
	Ian Shapiro
	Russell Capone
	Michael Klein
	55 Hudson Yards
	New York, NY 10001
	Tel: (212) 479-6000
	Fax: (212) 479-6275
	Email: cspeckhart@cooley.com
	ishapiro@cooley.com

¹ Concurrently herewith, the appellants are filing a motion seeking direct certification of this appeal to the Third Circuit Court of Appeals pursuant to 28 U.S.C. § 152(d)(2).

rcapone@cooley.com mklein@cooley.com

BAILEY GLASSER LLP

Brian A. Glasser Thomas B. Bennett Kevin W. Barrett Maggie B. Burrus

1055 Thomas Jefferson St. NW, Suite 540

Washington, DC 20007 Tel: (202) 463-2101 Fax: (202) 463-2103

Email: bglasser@baileyglasser.com tbennett@baileyglasser.com kbarrett@baileyglasser.com mburrus@baileyglasser.com

MASSEY & GAIL LLP

Jonathan S. Massey 1000 Maine Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511

Tel: (202) 652-4511 Fax: (312) 379-0467

Email: jmassey@masseygail.com

WALDREP WALL BABCOCK & BAILEY PLLC

Thomas W. Waldrep, Jr.

Kevin L. Sink James C. Lanik Jennifer B. Lyday 370 Knollwood Street, Suite 600

Winsten Salam NG 27102

Winston-Salem, NC 27103

Tel: (336) 717-1280 Fax: (336) 717-1340

Email: notice@waldrepwall.com

SHERMAN, SILVERSTEIN, KOHL, ROSE & PODOLSKY, P.A.

Arthur J. Abramowitz

Alan I. Moldoff

Ross J. Switkes

308 Harper Drive, Suite 200

Moorestown, NJ 08057

Tel: (856) 662-0700

Email: aabramowitz@shermansilverstein.com

	amoldoff@shermansilverstein.com rswitkes@shermansilverstein.com
Patricia Cook	WEITZ & LUXENBERG, P.C. Perry Weitz Lisa Nathanson Busch Justine Delaney 700 Broadway New York, NY 10083 Tel: (212) 558-5500 Email: lbusch@weitzlux.com pw@weitzlux.com jdelaney@weitzlux.com
Evan Plotkin	LEX NOVA LAW, LLC E. Richard Dressel 10 E. Stow Rd., Suite 250 Marlton, NJ 08053 Tel. (856) 382-8550 Email: rdressel@lexnovalaw.com DEAN OMAR BRANHAM SHIRLEY, LLP Trey Branham 302 N. Market Street, Suite 300 Dallas, TX 75202 Tel: (214) 722-5990 Email: tbranham@dobslegal.com
Randy Derouen	LEVY KONIGSBERG LLP Moshe Maimon Jerome H. Block Audrey Perlman Raphael 605 Third Avenue, 33 rd Floor New York, NY 10158 Tel: (212) 605-6200 Email: MMaimon@levylaw.com JBlock@levylaw.com ARaphael@levylaw.com
Kristie Doyle, as estate representative of Dan Doyle	SAIBER LLC Marc E. Wolin John M. August 18 Columbia Turnpike, Suite 200 Florham Park, NJ 07932 Tel: (973) 622-8401

	F 1 1: 0 1
	Email: mwolin@saiber.com
	jaugust@saiber.com
	KAZAN, McCLAIN, SATTERLEY &
	GREENWOOD
	A Professional Law Corporation
	Steven Kazan, Esq.
	Joseph D. Satterley, Esq.
	Denyse F. Clancy, Esq.
	Jack London Market
	55 Harrison Street, Suite 400
	Oakland, California 94607
	Tel: (510) 302-1000
	Email: skazan@kazanlaw.com
	JSatterley@kazanlaw.com
	DClancy@kazanlaw.com
Katherine Tollefson	MAUNE RAICHLE HARTLEY FRENCH
	& MUDD LLC
	Suzanne M. Ratcliffe
	150 West 30 th Street, Suite 201
	New York, NY 10001
	Tel: (800) 358-5922
	Email: sratcliffe@mrhfmlaw.com
	Neil J. Maune
	Marcus E. Raichle Jr.
	Christopher McKean
	Clayton L. Thompson
	1015 Locust Street
	St. Louis, MO 63191
	Tel: (800) 358-5922
	Email: nmaune@mrhfmlaw.com
	mraichle@mrhfmlaw.com
	cmckean@mrhfmlaw.com
	cthompson@mrhfmlaw.com
Tonya Whetsel, as estate representative of	KARST & von OISTE, LLP
Brandon Whetsel	David A. Chandler
	505 Main Street
	Port Jefferson, NY 11777
	Tel: (855) 970-9988
	Email: dac@karstvonoiste.com
LTL Management, LLC	WOLLMUTH MAHER & DEUTSCH
	LLP
	Paul R. DeFilippo

500 Fifth Avenue New York, NY 10110 Tel: (212) 382-3300

Fax: (212) 382-0050

Email: pdefilippo@wmd-law.com

JONES DAY

Gregory M. Gordon

Brad B. Erens

Dan B. Prieto

Amanda Rush

2727 N. Harwood Street

Dallas, TX 75201

Tel: (214) 220-3939

Fax: (214) 969-5100

Email: gmgordon@jonesday.com bberens@jonesday.com dbprieto@jonesday.com arush@jonesday.com

Official Committee of Talc Claimants I

GENOVA BURNS LLC

Daniel M. Stolz

Donald W. Clarke

110 Allen Road, Suite 304

Basking Ridge, NJ 07920

Tel: (973) 467-2700

Fax: (973) 467-8126

Email: dstolz@genovaburns.com dclarke@genovaburns.com

BROWN RUDNICK LLP

David J. Molton

Robert J. Stark

Michael S. Winograd

Seven Times Square

New York, NY 10036

Tel: (212) 209-4800

Fax: (212) 209-4801

Email: dmolton@brownrudnick.com

rstark@brownrudnick.com

mwinograd@brownrudnick.com

Jeffrey L. Jonas Sunni P. Beville One Financial Center

Boston, MA 02111

	T
	Tel: (617) 856-8200
	Fax: (617) 856-8201
	Email: jjonas@brownrudnick.com
	sbeville@brownrudnick.com
	_
	OTTERBOURG PC
	Melanie L. Cyganowski
	Adam C. Silverstein
	Jennifer S. Feeney
	230 Park Avenue
	New York, NY 10169
	Tel: (212) 905-3628
	Fax: (212) 682-6104
	Email: mcyganowski@otterbourg.com
	asilverstein@otterbourg.com
	jfeeney@otterbourg.com
	PARKINS LEE & RUBIO LLP
	Pennzoil Place
	700 Milan Street, Suite 1300
	Houston, TX 77002
	Tel: (713) 715-1666
	Email: lparkins@parkinslee.com
	crubio@parkinslee.com
Arnold & Itkin LLP	PACHULSKI STANG ZIEHL & JONES
	LLP
	Laura Davis Jones
	Karen B. Dine
	Colin R. Robinson
	Peter J. Keane
	919 N. Market Street, 17th Floor
	Wilmington, DE 19801
	Tel: (302) 652-4100
	Fax: (302) 652-4400
	Email: ljones@pszjlaw.com
	v er v
1	kdine@pszjlaw.com
	anahingan@nazilawa
	crobinson@pszjlaw.com
	crobinson@pszjlaw.com pkeane@pszjlaw.com
	pkeane@pszjlaw.com
Aylstock, Witkin, Kreis & Overholtz, PLLC	pkeane@pszjlaw.com OFFIT KURMAN, P.A.
Aylstock, Witkin, Kreis & Overholtz, PLLC	pkeane@pszjlaw.com OFFIT KURMAN, P.A. Paul J. Winterhalter
Aylstock, Witkin, Kreis & Overholtz, PLLC	pkeane@pszjlaw.com OFFIT KURMAN, P.A. Paul J. Winterhalter 99 Wood Avenue South, Suite 302
Aylstock, Witkin, Kreis & Overholtz, PLLC	pkeane@pszjlaw.com OFFIT KURMAN, P.A. Paul J. Winterhalter 99 Wood Avenue South, Suite 302 Iselin, New Jersey 08830
Aylstock, Witkin, Kreis & Overholtz, PLLC	pkeane@pszjlaw.com OFFIT KURMAN, P.A. Paul J. Winterhalter 99 Wood Avenue South, Suite 302

	Email: pwinterhalter@offitkurman.com
	KTBS LAW LLP Michael L. Tuchin Robert J. Pfister Samuel M. Kidder Nir Maoz 1801 Century Park East, 26th Floor Los Angeles, California 90067 Tel: (310) 407-4000 Fax: (310) 407-9090 Email: mtuchin@ktbslaw.com rpfister@ktbslaw.com skidder@ktbslaw.com nmaoz@ktbslaw.com
Claimants Represented by the Barnes Law Group	COLE SCHOTZ P.C. Felice Yudkin Court Plaza North 25 Main Street P.O. Box 800 Hackensack, NJ 07602-0800 Tel: (201) 489-3000 Fax: (201) 489-1536 Email: fyudkin@coleschotz.com Mark Tsukerman 1325 Avenue of the Americas, 19th Floor New York, NY 10019-6079 Tel: (212) 752-8000 Fax: (646) 563-7948 Email: mtsukerman@coleschotz.com
DeSanto Canadian Class Action Creditors	LITE DEPALMA GREENBERG & AFANADOR, LLC Allen J. Underwood II 570 Broad Street, Suite 1201 Newark, NJ 07102 Tel: (973) 623-3000 Email: aunderwood@litedepalma.com
Andrew R. Vara, United States Trustee, District of New Jersey	THE OFFICE OF THE UNITED STATES TRUSTEE, DISTRICT OF NEW JERSEY Martha R. Hildebrandt, Assistant United States Trustee Jeffrey M. Sponder, Trial Attorney

Case 21-30589-MBK Doc 1652 Filed 03/07/22 Entered 03/07/22 19:00:34 Desc Main Document Page 9 of 14

One Newark Center, Suite 2100 Newark, NJ 07102 Tel: (973) 645-3014
Fax: (973) 645-5993

[signatures follow]

Date: March 7, 2022

SHERMAN, SILVERSTEIN, KOHL, ROSE & PODOLSKY, P.A.

/s/ Arthur J. Abramowitz

Arthur J. Abramowitz
Ross J. Switkes
Sherman, Silverstein, Kohl, Rose &
Podolsky, P.A.
308 Harper Drive, Suite 200
Moorestown, NJ 08057
Tel: (856) 662-0700
aabramowitz@shermansilverstein.com
rswitkes@shermansilverstein.com

Proposed Local Counsel to the Official Committee of Talc Claimants II

WEITZ & LUXENBERG, P.C.

/s/ Lisa Nathanson Busch

Lisa Nathanson Busch 700 Broadway New York, NY 10083 Tel: (212) 558-5500 lbusch@weitzlux.com

Counsel to Patricia Cook

LEX NOVA LAW, LLC

/s/ E. Richard Dressel

E. Richard Dressel 10 E. Stow Rd., Suite 250 Marlton, NJ 08053 Tel: (856) 382-8550 rdressel@lexnovalaw.com

Counsel to Evan Plotkin

LEVY KONIGSBERG LLP

/s/ Jerome H. Block

Jerome H. Block 605 Third Avenue, 33rd Floor New York, NY 10158 Tel: (212) 605-6200 jblock@levylaw.com

Counsel to Randy Derouen

SAIBER LLC

/s/ Marc E. Wolin

Marc E. Wolin John M. August 18 Columbia Turnpike, Suite 200 Florham Park, NJ 07932 Tel: (973) 622-8401 mwolin@saiber.com jaugust@saiber.com

Counsel to Kristie Doyle, as estate representative of Dan Doyle

MAUNE RAICHLE HARTLEY FRENCH & MUDD LLC

/s/ Suzanne M. Ratcliffe

Suzanne M. Ratcliffe 150 West 30th Street, Suite 201 New York, NY 10001 Tel: (800) 358-5922 sratcliffe@mrhfmlaw.com

Counsel to Katherine Tollefson

KARST & von OISTE, LLP

/s/ David A. Chandler

David A. Chandler 505 Main Street Port Jefferson, NY 11777 Tel: (855) 970-9988 dac@karstvonoiste.com

Counsel to Tonya Whetsel, as estate representative of Brandon Whetsel

Case 21-30589-MBK Doc 1652 Filed 03/07/22 Entered 03/07/22 19:00:34 Desc Main Document Page 12 of 14

Exhibit A

Order

Case 21-30589-MBK Doc 1662 Filed 03/02/22 Entered 03/02/22 19:00:34 Desc Main Dipocomeent Pagget3 of 24

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	Order Filed on March 2, 2022 by Clerk U.S. Bankruptcy Court District of New Jersey
In Re:	Case No.:
	Chapter:
	Hearing Date:
	Judge:

ORDER DENYING MOTIONS TO DISMISS

The relief set forth on the following pages, numbered two (2) through _____2___ is **ORDERED**.

DATED: March 2, 2022

Honorable Michael B. Kaplan United States Bankruptcy Judge THIS MATTER comes before the Court upon motions filed by the Official Committee of Talc Claimants (ECF No. 632) and the law firm of Arnold & Itkin, LLP, on behalf of certain talc personal injury claimants (ECF No. 766), seeking an order of the Court dismissing the within bankruptcy proceeding pursuant to § 1112(b) as not having been filed in good faith; And the Court having considered fully the submissions of the parties and the argument of counsel the week of February 14, 2022 - February 18, 2022; and for good cause; IT IS HEREBY

ORDERED that the Motions (ECF Nos. 632 and 766) are DENIED in their entirety for reasons set forth in the accompanying opinion on the docket (ECF No. 1572).